

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

Case No. 1:22-cv-22171-JEM

**MICHAEL J. FITZGERALD,
Individually, and YELANY DE VARONA,
Individually**

Plaintiffs,

v.

**RONDA MCNAE, individually, and
WILLIAM MCNAE, individually,**

Defendants.

/

PLAINTIFF'S AMENDED TRIAL EXHIBIT LIST¹

Presiding Judge:	Attorneys for Plaintiff:	Attorney for Defendant:
Hon. Jose E. Martinez	Peter E. Berlowe Meredith J. Gussin	Nichelle Lynn Womble
Trial Date:	Court Stenographer:	Courtroom Deputy:
Trial Calendar beginning April 7, 2025	Mary Ann Casale	Albert del Toral

Exhibit	Date Offered	Marked	Admitted	Detailed Description of Exhibit
1			■	Contract of Employment Between SoftwareONE UK Ltd. and Fitzgerald (Fitz 00842-860)
2			■	SoftwareONE Salary Review 2022 dated March 16, 2022

¹ A-Authenticity; I-Contains inadmissible matter; R-Relevancy; H-Hearsay; UP-Unduly prejudicial, probative value outweighed by undue prejudice; P-Privileged. See S.D. Local Rule 16.1(e)(9).

				(Fitz 001234)
3			■	SoftwareONE paid leave email dated July 24, 2022 (Fitz 00417)
4			■	Anna Knight Email dated June 6, 2023 (Exhibit 161 to Sheri Fiske Deposition)
5			■	SoftwareONE Performance Share Plan Regulations May 2020 (Fitz 2795 – 2815)
6			■	SoftwareONE Performance Share Plan Regulations May 2021 (Fitz 2816 – 2834)
7			■	SoftwareONE Performance Share Plan Regulations May 2022 (Fitz 2774 – 2794)
8			■	SoftwareONE Long-Term Incentive 2022 Statement dated March 25, 2022 (Fitz 2773)
9			■	Michael Fitzgerald's SoftwareONE Pay Stubs from 2016 through 2022 (Fitz 1151-1232)
10			■	Sheri Fiske PowerPoint Presentation
11			■	June 15, 2020 Confidential Settlement Agreement (Fitz 0001-0005)
				All deposition transcripts and videos of depositions
				All exhibits listed by Defendant
				All impeachment exhibits

				All rebuttal exhibits
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Dated: April 10, 2025

Respectfully submitted,

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